

AO 91 (Rev. 11/11) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the  
Southern District of TexasUnited States District Court  
Southern District of Texas  
FILED

NOV 30 2019

United States of America  
v.  
Stephanie PICHARDO (1994/USA)David J. Bradley, Clerk  
Case No. M-19-2924-M

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Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of November 30, 2019 in the county of Hidalgo in the  
Southern District of Texas, the defendant(s) violated:

| <i>Code Section</i> | <i>Offense Description</i>  |
|---------------------|---|
| 21 USC § 952        | Illegal Importation of a Controlled Substance / Approximately 55.12 Kilograms of Methamphetamine, a Schedule II Controlled Substance.         |
| 21 USC § 963        | Conspiracy to Illegally Import a Controlled Substance / Approximately 55.12 Kilograms of Methamphetamine, a Schedule II Controlled Substance. |

This criminal complaint is based on these facts:

See Attachment "A"

☒ Continued on the attached sheet.Submitted by reliable electronic means, sworn to  
and attested to telephonically per Fed. R. Cr. 4.1,  
and probable cause found on:

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/s/ Lori Pendergrass

Complainant's signature

Lori Pendergrass, HSI Special Agent

Printed name and title

Sworn to before me

Date: Nov. 30, 2019 2:57 p.m.City and state: McAllen, Texas

Judge's signature

U.S. Magistrate Judge Peter Ormsby

Printed name and title

**Attachment "A"**

I, Lori Pendergrass am a Special Agent of the United States Homeland Security Investigations (HSI) and have knowledge of the following facts. The facts related in this attachment do not reflect the totality of information known to me or other agents/officers, merely the amount needed to establish probable cause. I do not rely upon facts not set forth herein in reaching my conclusion that a complaint should be issued, nor do I request that this Court rely upon any facts not set forth herein in reviewing this attachment in support of the complaint.

1. On November 30, 2019, Homeland Security Investigations in McAllen, Texas, (HSI McAllen) received a request for investigative assistance from the U.S. Customs and Border Protection (CBP) Office of Field Operations (OFO) at the Hidalgo Port of Entry (POE) in Hidalgo, Texas. CBP Officers (CBPOs) detained Stephanie PICHARDO (hereinafter PICHARDO), a citizen of the United States of America and driver of the vehicle, while attempting to enter the U.S. with approximately 55.12 kilograms (kg) of methamphetamine concealed within an aftermarket constructed concealed compartment in the floor of the passenger car she was driving.
2. During primary inbound inspection, CBP Officers (CBPOs) obtained a negative oral declaration for fruits, food, alcohol, tobacco, drugs, weapons and currency over \$10,000.00. from PICHARDO. CBPOs referred PICHARDO and the vehicle to secondary inspection for an intensive examination.
3. During secondary inspection, the vehicle was X-rayed, revealing anomalies in the floor area of the vehicle.
4. A physical search of the vehicle was conducted, and 53 foil wrapped, vacuum sealed packages covered in laundry detergent, weighing approximately 55.12 kilograms, were discovered concealed within an aftermarket constructed concealed compartment in the floor of the vehicle. CBPOs field tested the substance inside the packages which was presumptive positive for the properties and characteristics of methamphetamine.
5. Homeland Security Investigations (HSI), Special Agents (SA) responded to the Hidalgo POE to assist in the investigation. HSI SAs interviewed PICHARDO who, after providing several inconsistent and false statements, stated she was hired by an unknown person in Mexico and was to be paid \$11,000 USD to transport narcotics from Mexico into the United States.